

REMARKS/ARGUMENTS

Claims 1-25 and 27-31 are all the claims currently pending in the application. Based on the following remarks, Applicant requests reconsideration of the application and allowance of the claims.

I. Rejection of Claims 1-25 and 27-30 Under 35 U.S.C. § 103

The Examiner again rejects claims 1-25 and 27-30 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Crozier (U.S. Patent No. 5,701,423; hereinafter “Crozier”) in view of Norin et al. (U.S. Patent No. 5,794,253; hereinafter “Norin”).

Applicant again respectfully submits that the combination of Crozier and Norin does not teach or suggest all of the features of claim 1. In contrast to claim 1, Crozier, either alone or in combination with Norin, at best, discloses “choosing corresponding records from ... two files, comparing the information of corresponding fields of these records, and allowing the user to decide how to change the data in one of the two files to bring them into agreement.” (Col. 3, lines 33-37 of Crozier)

Claim 1 recites, *inter alia*, “determining a synchronization set by: ... “(ii) determining which, if any, information records have been added to or modified at the source dataset since the source dataset was last synchronized with the target dataset.” In rejecting claim 1, the Examiner suggests that the handheld computer 101 corresponds to the claimed information records of a source dataset residing on a first device and suggests that the desktop computer 115 corresponds to the claimed information records of a target dataset residing on a second device and relies on column 11, lines 62-67, column 12, lines 1-8 and FIG. 7 of Crozier as disclosing features of claim 1. (See pg. 3 of the Office Action) Applicant again disagrees.

The cited portion of Crozier, either alone or in combination with Norin, at best, explains that a “user is optionally notified during translation if any of the existing data in the desktop application” (alleged target dataset) “are different from the data in the handheld application” (alleged source dataset). The cited portion further merely explains that FIG. 7 shows a “screen display which allows the user to decide what to do about conflicts” and explains that “[i]f a record exists in the desktop application” (alleged target dataset) “with the same Name, the data in each field in the desktop is compared with the data from the handheld” (alleged source dataset)

and “if the data in any given field is different, the user may accept the update to the field, ignore it, or edit part or all of the incoming data in the record and write it to the desktop application’s” (alleged target dataset) “file.”

Nowhere in the cited portion is there any mention, teaching or suggestion relating to determining which information records have been added to or modified at the handheld computer 101 (alleged source dataset) since the handheld computer 101 (alleged source dataset) was last synchronized with the desktop computer, (alleged target dataset) as required by claim 1. Instead, the cited portion specifically teaches away from “determining which, if any, information records have been added to or modified at the source dataset since the source dataset was last synchronized with the target dataset” given that Crozier, at best, discloses that the data in each field in the desktop” (alleged target dataset) is compared with the data from the handheld” (alleged source dataset). There simply is no mention, teaching or suggestion relating to any determination of information records that have been added to or modified at the handheld computer since the handheld computer 101 *was last synchronized* with the desktop computer 115, as required by claim 1. Crozier, is simply altogether silent regarding any determination of information records added or modified at the handheld computer since a last synchronization with the desktop computer. For instance, column 12, lines 9-15 of Crozier explains that handheld computer data 109 may be compared with a desktop computer Database Manager 123 “which contains an earlier version of the data in the handheld computer.” (emphasis added) Existing data in one device that is compared to a previous version of data in another device is not tantamount to determining any information records that have been added to or modified at a source dataset since the source dataset *was last synchronized* with a target dataset, as claimed. In the *Response to Arguments* section, the Examiner asserts that Crozier discloses that “at the initial state, or after the last synchronization and before any change applied to the copies of data, both copies of data are the same.” (See pg. 13 of Office Action) Contrary to the Examiner’s assertion, column 12, lines 9-13 of Crozier (which describes Table 3) directly refutes the Examiner’s assertion by explaining that at an initial state the desktop computer 115 may have a version of data that is earlier than a version of data in the handheld computer 101, irrespective of any prior synchronization.

Even assuming *arguendo* that Crozier, either alone or in combination with Norin,

discloses determining which records have been updated to or modified at the handheld computer, it is not necessarily the case that this determination was made since a last synchronization with the desktop computer, as required by claim 1. As noted above with respect to column 12, lines 9-15 of Crozier any comparison of records in the desktop computer and the handheld computer could be without regard to any previous synchronization of the handheld computer with the desktop computer.

Crozier, alone or in combination with Norin, also fails to teach or suggest “based on said synchronization set, synchronizing information records of the source dataset with information records of the target dataset by:” (i) using said unique identifiers, deleting from the target dataset any information records which have been previously transmitted to the target dataset but no longer exist at the source dataset. Rather, column 9, lines 10-11 and table 1 of Crozier cited by the Examiner, at best, discloses a portion of a pseudocode relating to “update [of a] desktop field table for [a] specified handheld field.” Nowhere in the cited portion or any portion of Crozier, either alone or in combination with Norin, is there any teaching or suggestion relating to usage of record identifiers to delete from the desktop computer 115 (alleged target dataset) any information records that have been previously transmitted to the desktop computer 115 but no longer exists at the handheld computer 101 (alleged source dataset), as required by claim 1.

Instead, Crozier, at best, explains that “a user of a computer may dynamically reconcile” the information in “two files” (e.g., the handheld computer and the desktop computer) by “comparing the information of corresponding fields and allowing the user to decide how to change the data in one of the two files to bring them into agreement” and allows him to make decisions about whether to accept the new data, ignore it or change it.” (Col. 4, lines 63-67 & Col. 5, lines 39-42 of Crozier)

Column 11, line 65 to column 12, line 1-6 of Crozier explains that the user is provided a screen which allows the user to decide what to do about conflicts and describes that “[i]f a record exists in the desktop application with the same Name, the data in each field in the desktop is compared with the data from the handheld” and “[i]f the data in any given field is different,” the user may accept the update to the field, ignore it, or edit part or all of the incoming data in the record and write it to the desktop application’s file.” As shown in FIG. 7 of Crozier, the “Key Field Name: Name” is used to determine if there is a conflict between the handheld device

(alleged first device) and the desktop computer (alleged second device) and as such Crozier does not disclose that each information record of the handheld computer 101 is assigned a unique record ID that is independent of either the handheld computer 101 or the desktop computer 115 for identifying each information record at the handheld computer 101 and the desktop computer 115, as required by claim 1. Moreover, there is no disclosure in Crozier relating to any record ID that is independent of the handheld computer or the desktop computer.

Since Crozier, at best, discloses allowing the user to decide whether to change conflicting data stored in handheld computer and the desktop computer and given that the user may ignore the conflict, Crozier, alone or in combination with Norin, is incapable of teaching or suggesting usage of globally unique identifiers (or any type of identifiers) *to delete* from the desktop computer 115 (alleged target dataset) *any information records* which have been previously transmitted to the desktop computer (alleged target dataset) *but no longer exist* at the handheld computer, (alleged source dataset) as required by claim 1. All of the information records in Crozier which have been previously transmitted to the desktop computer but which no longer exist at the handheld computer are not deleted based on usage of identifiers, as claimed. Instead, Crozier explains that “the final result may be to update some fields of the desktop records and not others.” (Col. 12, lines 6-8) In Crozier, any deletion of any record is based on a choice of the user whereas claim 1 requires deletion of information records at the target dataset which no longer exist at the source dataset.

Applicant disagrees with the Examiner’s assertion that Norin discloses the claimed globally unique identifier. Nowhere in the cited portion (or any portion) of Norin, is there any mention, teaching or suggestion relating to usage of a “Globally Unique ID (GUID)” *to delete from a target dataset* any information records which have been previously transmitted to the target dataset *but no longer exist* at the source dataset, and using a Globally Unique ID to update the target dataset so that the target dataset includes information records determined to have been added to or modified at the source dataset since the source dataset was last synchronized with the target dataset, as required by claim 1. Rather, Norin, at best, describes that the “Globally Unique ID” disclosed therein is used “to distinguish a replica node from another” replica node” and explains that “each replica node keeps a list of the” “data sets (data objects).” (Col. 9, lines 13-26 & 61-67 of Norin) Norin also explains that a replica node consists of a server, desktop

computer, laptop or any other system where a copy of a data set or data set properties may reside and in which data objects are replicated. (Col. 4, lines 22-23 & Col. 8, lines 24-32 of Norin)
The Globally Unique ID of Norin, at best, serves to identify replica nodes and there is no teaching or suggestion in Norin, alone or in combination with Crozier relating to usage of the Globally Unique ID as an identifier to identify each information record at both the handheld computer 101 (alleged source dataset) and the desktop computer 115 (alleged target dataset) and for updating and deleting information records at the desktop computer 115, as required by claim 1.

Based on at least the foregoing reasons, Applicant again submits that the combination of Crozier and Norin are deficient and do not teach or suggest all of the features of claim 1. Applicant therefore respectfully requests the Examiner to reconsider and withdraw the § 103(a) rejection of claim 1 and its dependent claims 2-20.

Since claim 21 contains features that are analogous to, though not necessarily coextensive with, the features recited in claim 1, Applicant submits that claim 21 and its dependent claims are patentable at least for reasons analogous to those submitted for claim 1. Additionally, Applicant submits that allowing a user to decide whether to change conflicting data stored in the handheld computer and the desktop computer and allowing the user to ignore the conflict (as at best disclosed by the combination Crozier and Norin) fails to teach or suggest a *means for* determining for each dataset information which has been previously received from the other dataset but which no longer exists at the other dataset, and” “*means for* determining for each dataset information which has been added or modified at the other dataset since the other dataset was last synchronized with said each dataset,” as claimed. (See In re Bell, 26 U.S.P.Q.2d 1529 (Fed. Cir. 1993)). The proper interpretation of the structure associated with the means elements of claim 21, is for example, the elements of FIGS. 4 and 5A which consist of devices. As such, Applicant again submits that a user making decisions simply does not teach or suggest any means for making determinations recited in claim 21. Accordingly, claim 21 and its dependent claims 22-25 and 27-30 are patentable at least for this additional reason.

With further regard to claim 6, Applicant submits that Crozier alone or in combination with Norin fails to teach or suggest “wherein said globally unique identifiers are maintained in a record map stored apart from the source dataset,” as claimed. The Examiner relies on Norin

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column 10, lines 5-7 which again relates to Globally Unique IDs (GUIDs) and Fast Unique IDs (FUIDs). The cited passage at best, explains that a FUID is used for a change number, not for an information record. Nothing in the cited passage or any other portion of Norin describes where the FUID is kept and there certainly is no teaching or suggestion relating to any globally unique identifier that is maintained in a record map stored apart from a source dataset, as claimed. For at least this reason, claim 6 is independently patentable.

II. Conclusion

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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